

LAW OFFICES

CATALANO & PLACHE, PLLC3221 M Street, N.W.
Washington, DC 20007Telephone (202) 338-3200
Facsimile (202) 338-1700

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February 25, 2005

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Federal Communications Commission
Office of SecretaryMarlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554Re: *Ex Parte* Notice, Federal-State Joint Board on Universal Service;
CC Docket No. 96-45

Dear Secretary Dortch:

Pursuant to Section 1.1206 of the rules of the Federal Communications Commission ("FCC"), 47 C.F.R. § 1.1206, this letter provides notice that on February 24, 2005, Todd B. Lantor, Chief Regulatory Counsel of Nextel Partners, Inc. ("Nextel Partners"), along with Albert J. Catalano of Catalano & Plache, PLLC, counsel to Nextel Partners, met with Christopher Libertelli, Senior Legal Advisor to Chairman Michael K. Powell.

At the meeting, the attendees discussed the Rural Local Exchange Carriers' ("Rural LECS") Application for Review of the Bureau's Order in the above-referenced proceeding designating Nextel Partners as an Eligible Telecommunications Carrier ("ETC") in seven states, specifically noting the procedural deficiencies of the Rural LECs' arguments as discussed in Nextel Partners' Opposition to the Application for Review and Motion to Strike the Rural LECs' Reply to Opposition. The parties also discussed the misleading nature and factual inaccuracies of the maps submitted by TDS Telecom ("TDS") in the course of its *ex parte* communications, noting that Nextel Partners has not been designated in many of the study areas depicted on the TDS maps. In that regard, Nextel Partners confirmed its ability and commitment to provide the ETC supported services within the study areas in which it has been designated as an ETC and submitted the attached maps to further support that position.

The participants also discussed issues relating to the ETC designation process being considered in the above-captioned proceeding. During the course of the discussion, Nextel Partners made the following points:

- New ETC guidelines should not be applied retroactively to already designated ETCs to "take back" or revoke a designation. Any new reporting requirements should be applied to all designated ETCs equally.

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- The FCC should again clarify that once it takes jurisdiction over an ETC applicant it retains that jurisdiction.
- The FCC should commit to consideration of ETC petitions on a more rapid time frame and an expedited consideration process should be established for additional filings by a petitioner concerning states where the petitioner has already been designated an ETC.
- The focus of the ETC designation process must be on what is best for rural consumers – e.g., customer choice, new and innovative services and mobility.
- The FCC should emphasize that mobility is an important factor to be considered in any public interest test by both the FCC and the states.
- The framework established for review of petitions for designation established by *Virginia Cellular* is working and should not be expanded to allow overly burdensome or unlawful criteria. The FCC should make clear that the states cannot adopt ILEC monopoly-type conditions, such as equal access or “carrier of last resort” requirements, as a condition to ETC designation for wireless carriers.
- The ETC designation process should not be used as a means to control the growth of the Universal Service Fund. A comprehensive review of the mechanism for High-Cost support is the appropriate means to address the Fund growth issue.
- A Rural Task Force, composed of wireless and wireline representatives, should be established to undertake this comprehensive review and make recommendations to the Joint Board and to the FCC.

Very truly yours,

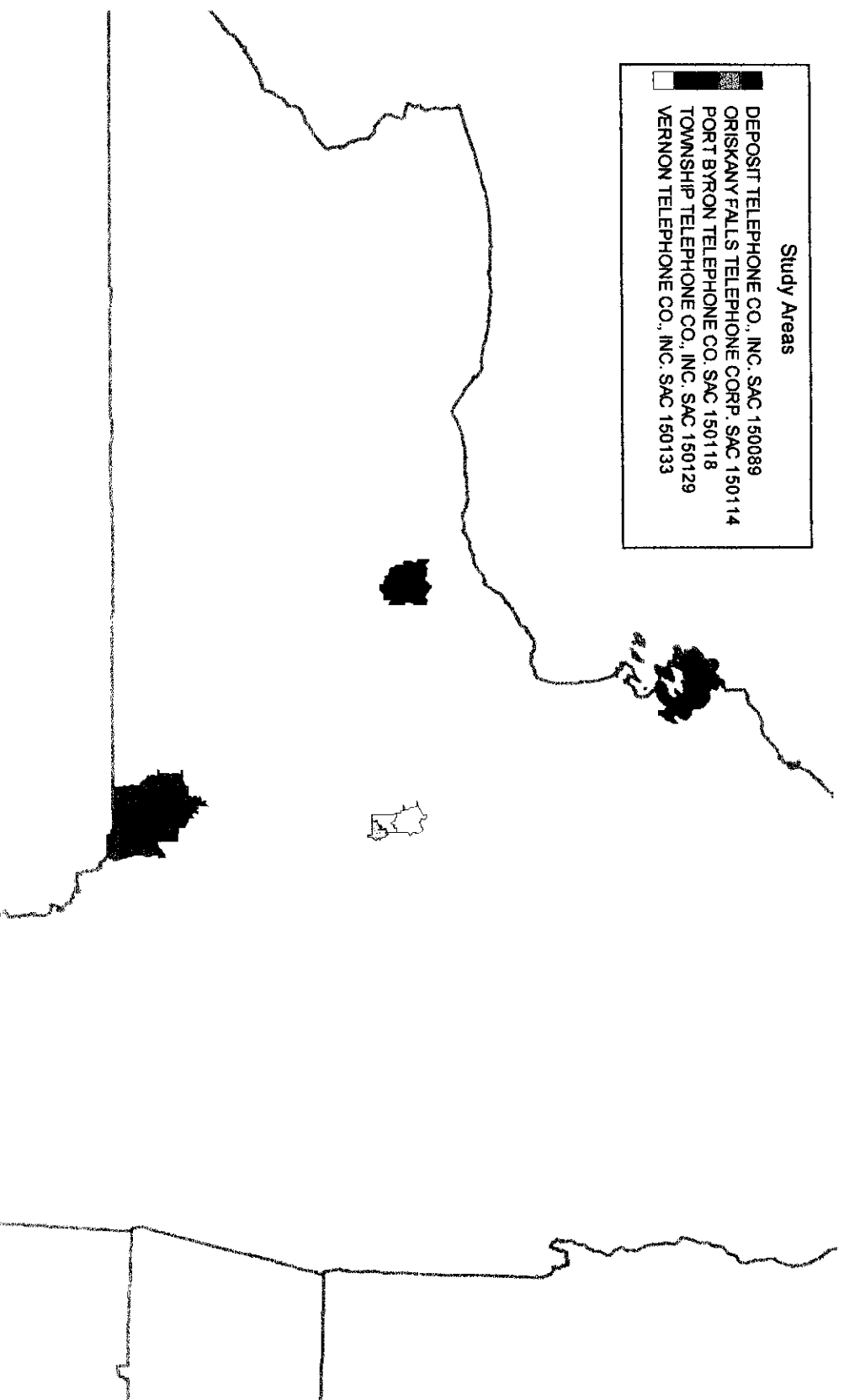
A handwritten signature in black ink, reading "Albert J. Catalano". The signature is written in a cursive, flowing style.

Albert J. Catalano

cc: Chairman Michael K. Powell
Christopher Libertelli

Attachment

New York Study Areas



New York Study Areas Current Coverage

Study Areas

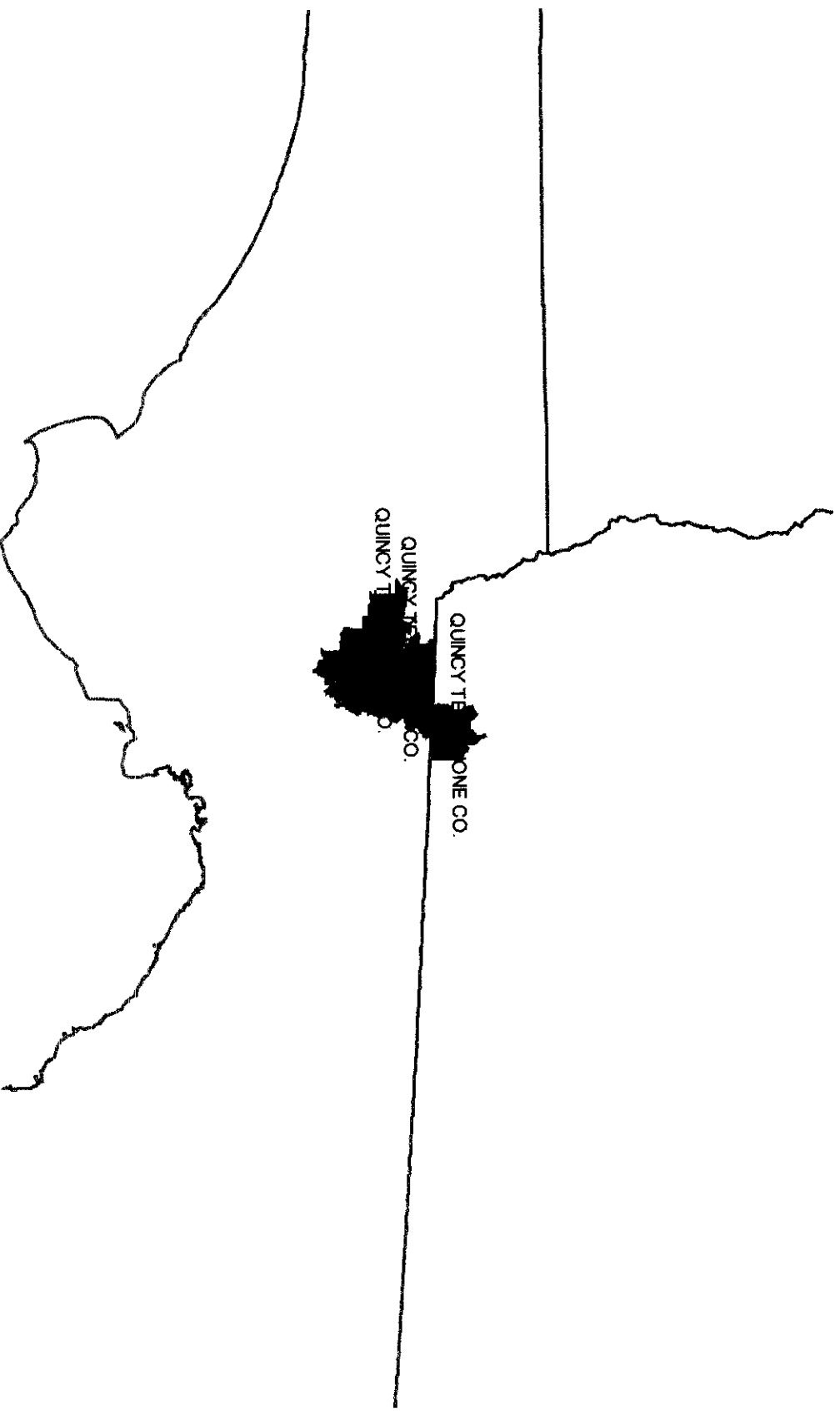
DEPOSIT TELEPHONE CO., INC. SAC 150089
ORISKANY FALLS TELEPHONE CORP. SAC 150114
PORT BYRON TELEPHONE CO. SAC 150118
TOWNSHIP TELEPHONE CO., INC. SAC 150129
VERNON TELEPHONE CO., INC. SAC 150133



Current Coverage Assumes 0.6 Watt Mobile

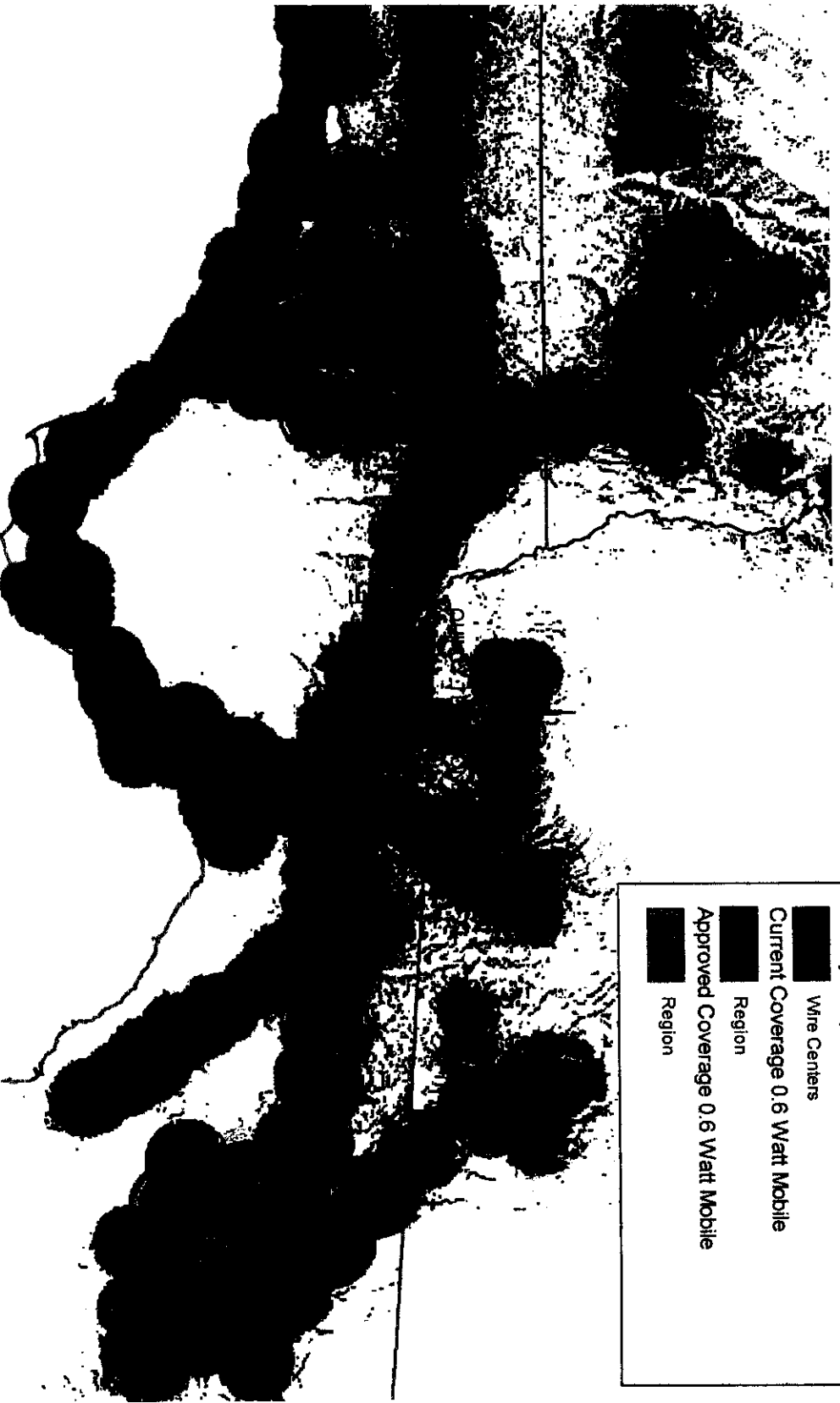
Quincy Telephone – FL and GA

SAC 2103338 and 2203338

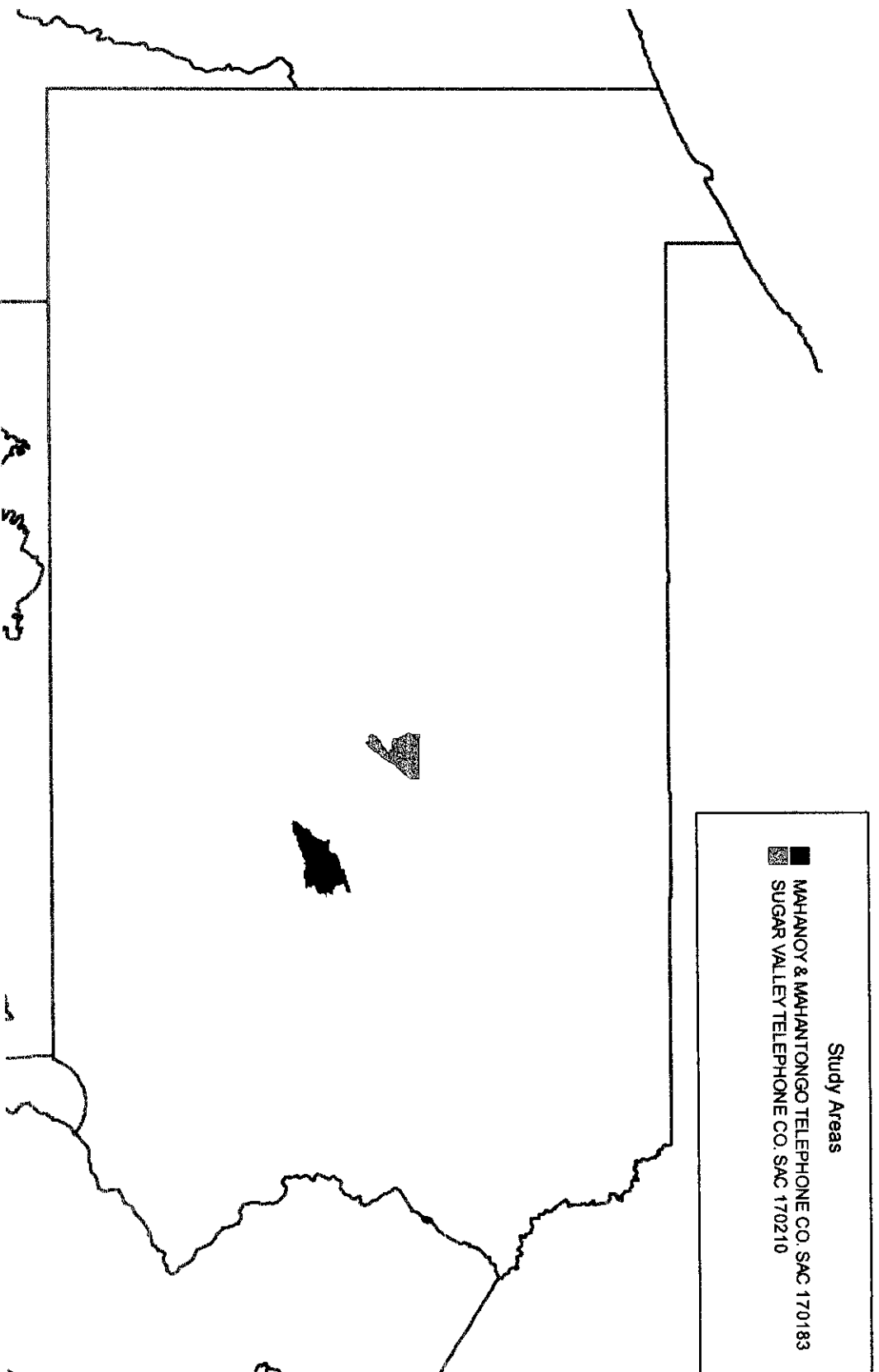


Nextel Partners

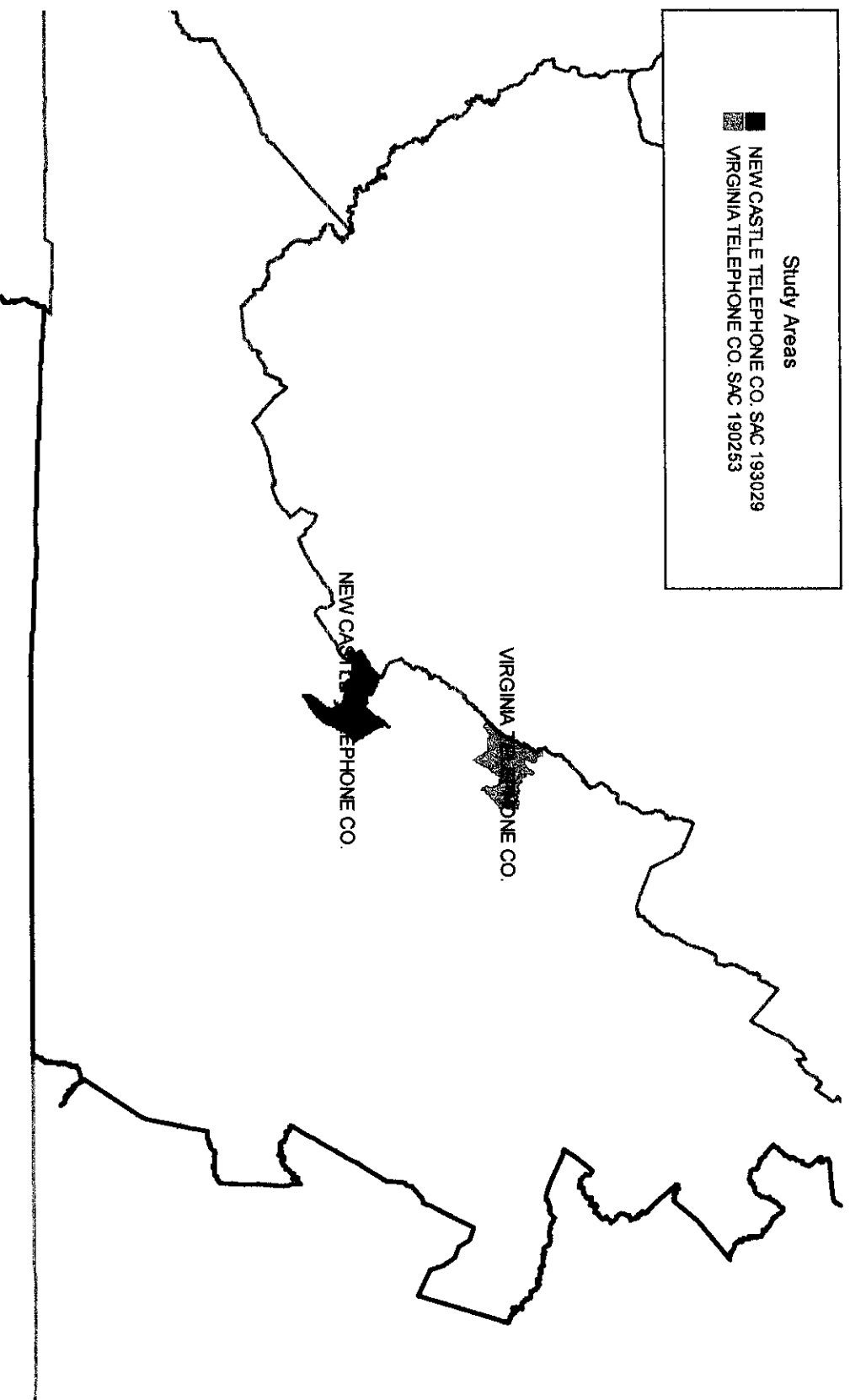
Current and Approved Coverage



Pennsylvania Study Areas



Virginia Study Areas

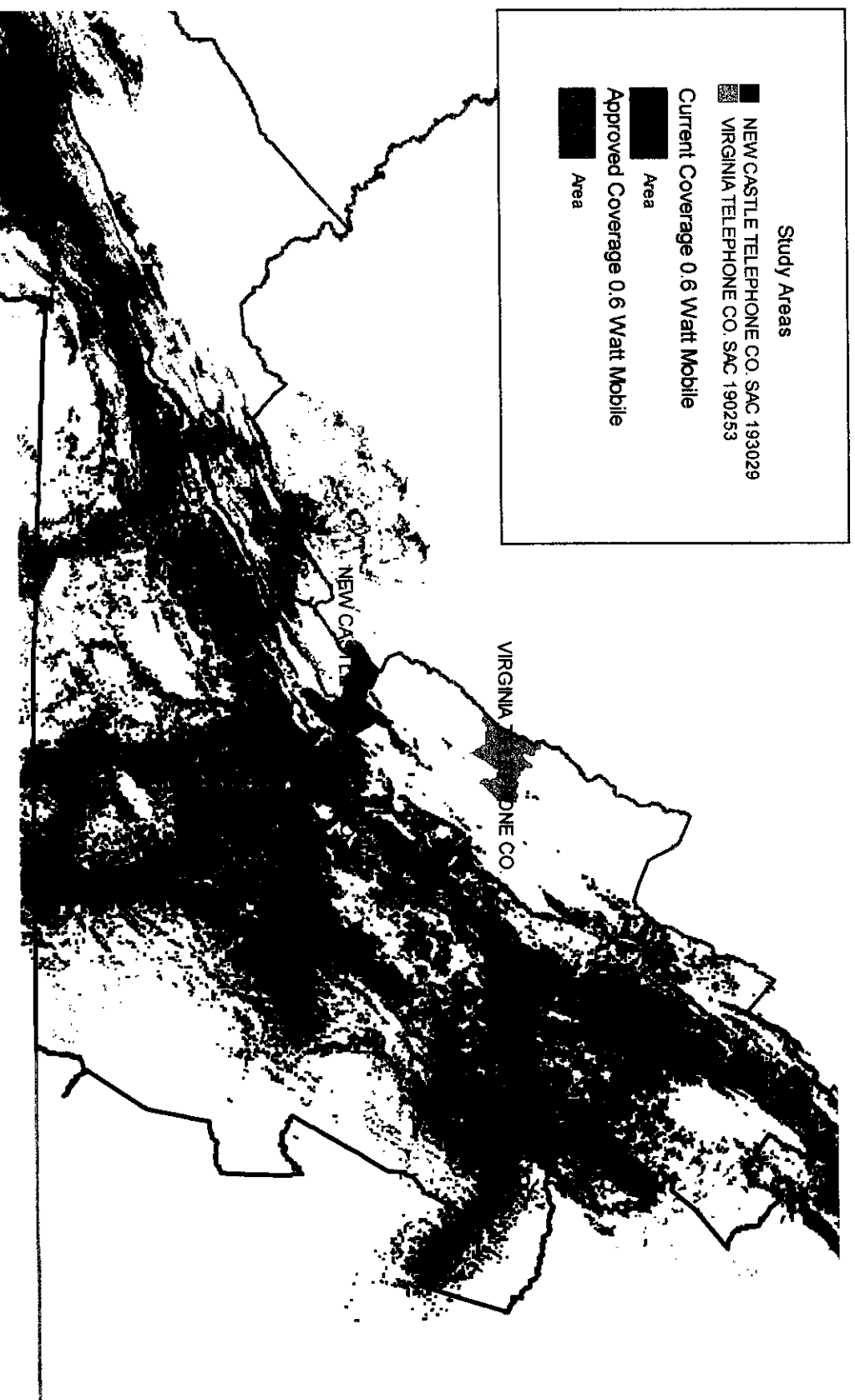


Nextel Partners Current Coverage



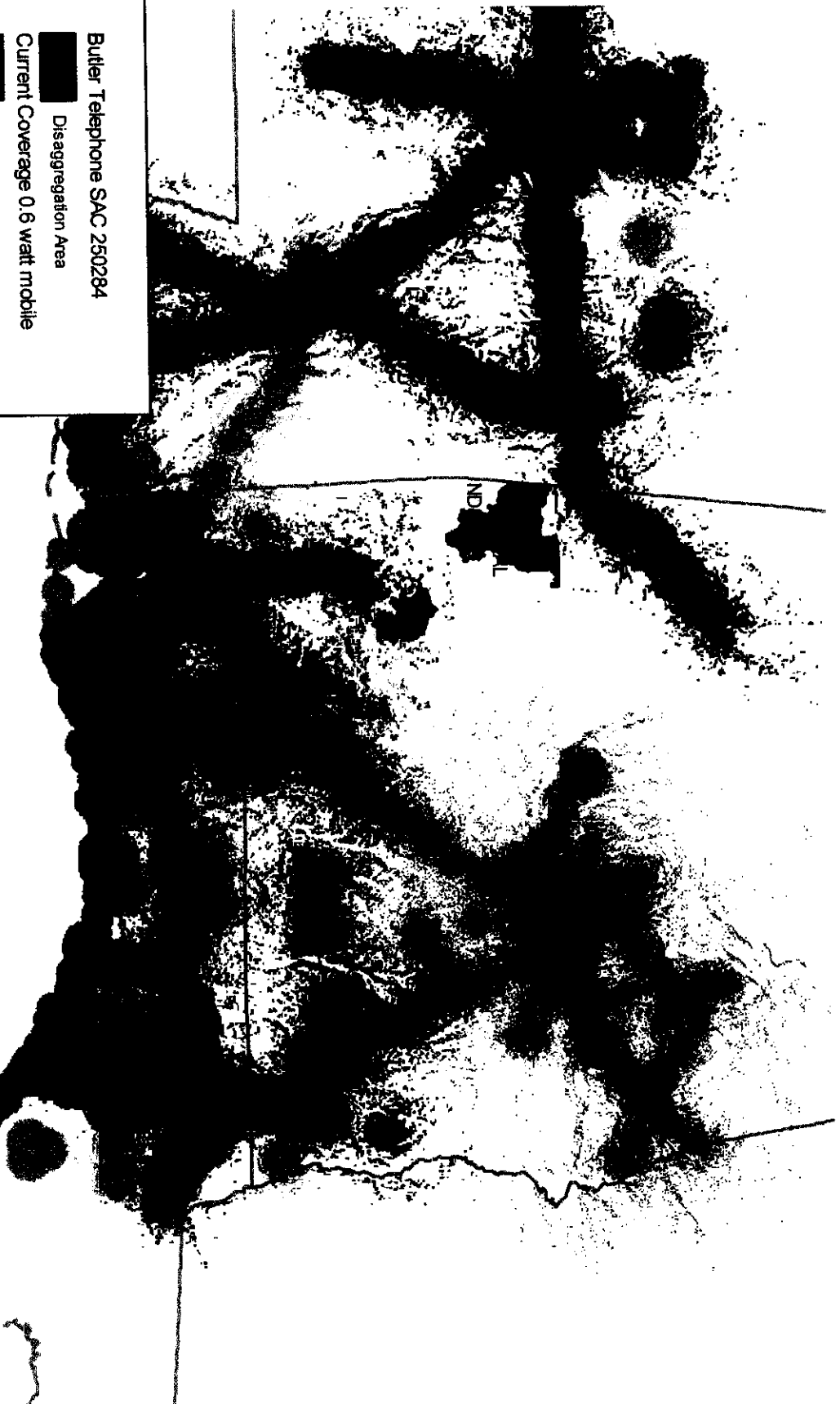
Current Coverage Assumes 0.6 Watt Mobile

Nextel Partners Current and Approved Coverage



Current Coverage Assumes 0.6 Watt Mobile

Nextel Partners Current and Approved Coverage



Butler Telephone SAC 250284

Disaggregation Area

Current Coverage 0.6 watt mobile

Area

Approved Coverage 0.6 watt mobile

Area